

IN2011.00053

Brigham Young University
Provo, Utah
UTD 009094012

Large Quantity Hazardous Waste Generator
Compliance Evaluation Inspection

March 9, 2011.

HAZARDOUS WASTE INSPECTION REPORT

Facility: Brigham Young University (BYU)

Date: March 9, 2011

Facility Address: 101 Chemicals Management Building (BYU Campus)
Provo, Utah 84602-7800

EPA ID Number: UTD 009094012

Facility Contact: James Cecil, Manager of Environmental Management

Phone: 801-422-6156 (main)
801-422-6452 (direct)
801-404-0036 (cell)

Facility Status: Large Quantity Generator

Notification: Generator

Part A: None

Applicable Regulations: R315-5, R315-8, R315-9, R315-13, and R315-16 of the
Utah Administrative Code

Type of Inspection: Compliance Evaluation Inspection

Participants: Rocky Stonestreet (Team Leader), DSHW
Ed Deputy, DSHW
James Cecil, BYU, Manager
Alfredo Chandia, BYU, RCRA Disposal Manager
Steven Zohner, BYU, Environmental Compliance Officer
McKell Sanderson, Student Assistant

Time In: 9:40 a.m.
Time Out: 4:00 p.m.

Weather Conditions: 40°F, partly cloudy

Report Prepared by: Rocky Stonestreet

Facility Description

Brigham Young University (BYU) is a privately owned university located in Provo, Utah. It is owned and operated by the Church of Jesus Christ of Latter Day Saints. The university has a student population of approximately 30,000 and a staff of around 6,500.

Credentials, Purpose, and Scope

The inspection was pre-arranged by the DSHW team leader Rocky Stonestreet, along with James Cecil of BYU. The inspection team arrived at the Chemicals Management Building located on campus.

The inspectors met with James Cecil, Alfredo Chandia, and Steven Zohner. The inspectors explained the purpose of the site visit, to evaluate BYU's hazardous waste management practices for compliance with R315 of the Utah Administrative Code (UAC). It was also explained that a walk through inspection would be necessary to properly evaluate all points of hazardous waste generation and storage areas, as well as a file and report review of all applicable hazardous waste records and management plans for compliance. The inspectors explained that the inspection was conducted under the authority of section R315-2-12 of the UAC.

BYU has approximately 350 laboratories. The university indicated that not all of them generate hazardous waste. The inspectors decided to observe a sampling of labs located within the chemistry, biology and physics buildings, as the university indicated that a good portion of them generate hazardous waste. Each lab has a professor assigned to help make hazardous waste determinations, as well as ensuring that all satellite containers are in good condition, closed and properly labeled. In addition, the other areas within the university that generate hazardous waste are engineering labs, life science labs, machine shops, paint shops and automotive maintenance shops. The university also has one dry cleaner.

Inspection Narrative

Inspection Meeting and Records Review:

All participants gathered to discuss the nature and order of the inspection. The inspectors began by reviewing the facility's hazardous waste management plans and manifests.

The inspectors reviewed three years of hazardous waste manifests, to get an idea of both quantities of waste generation as well as types of waste streams. Based on this review the inspectors confirmed that BYU is a large quantity generator. BYU generates a large variety of hazardous waste due to the various kinds of laboratories and shops that exist at the university. The university's largest hazardous waste stream is ignitable waste (D001) consisting of acetone and toluene, followed by aqueous waste of metals

(barium, chromium, lead, silver, cadmium and selenium. Other types of waste generated are reactive waste (D003), corrosive waste (D002) and lab packs. The lab packs consists of broken thermometers, polyester resin hardener, dimethyl phthalate and methyl ethyl ketone peroxide. The university indicated that their universal waste (used fluorescent tubes) is their largest overall waste stream. The inspectors noted the following waste codes listed on their manifests: D001, D002, D003, D004, D005, D006, D007, D008, D011, D018 D035, D039, F003 and F005, as well as various U wastes (discarded commercial chemical products and off-specification chemical products).

The inspectors noted that the manifests were properly filled out. In general, no concerns were noted with the exception of manifest #003463065, which did not have an accompanied LDR certification.

The inspectors reviewed the facility's personnel training records, preparedness and prevention plan, as well as the contingency and emergency procedure plan. James Cecil is the primary emergency coordinator and Alfredo Chandia is listed as back-up. All reviewed plans were checked for accuracy with state and federal rules, as well as completeness. All plans and records appeared to be complete with no concerns noted.

It was noted from the manifests that BYU uses Clean Harbor as their transporter and disposal facility. The facility indicated that their waste is picked up monthly and the manifest review confirmed this. The manifest review also showed that approximately 20 55-gallon drums of hazardous waste are picked up on average per month.

Facility Inspection, Waste Streams and Waste Management:

The walk through inspection began in the Chemicals Management Building where the university stores their hazardous waste (90-day waste). Also within this building the university has set up a device for puncturing aerosol cans, and a designated area for storing universal waste. The inspectors observed used fluorescent tubes that were in containers, but had no lids to keep them secure. The university indicated that they recycled all of their used fluorescent tubes.

It was explained that the university employs students (undergrads) as paid workers who are responsible to collect waste from the various generation areas (satellite accumulation areas). Once collected the students consolidate or bulk and manage each waste stream based on its hazardous characteristic or listing. The university showed the inspectors all pertinent training records and training manuals to ensure that the students are properly trained to handle their duties.

Within the Chemicals Management Building the university has set-up designated storage rooms. Based on the walk through inspection of these rooms, the inspectors did observe one container (cubic yard fiber board) that did not have a properly fitting lid. The container was thus considered to be in an open condition. The container held paint

waste and solvent rags. All other hazardous waste containers were observed to be properly labeled and in a closed condition.

The inspectors walked through a paint shop where wood working is performed. The inspectors observed two satellite containers (a 25-gallon satellite container and a 55-gallon container) with no labels identifying its contents. The university indicated that they held paint waste and were considered hazardous. No other concerns were noted.

The inspectors walked through the university's vehicle fleet shop. The inspectors observed two satellite containers (55-gal. drums) with no labels. The university indicated that they held paint waste and solvent. No other concerns were noted.

The inspectors walked through university's biology, chemistry and physics buildings to inspect a random sampling of laboratories in each. The inspectors observed that all satellite containers (5-gallons) were not properly labeled. The university indicated that this container management practice (labeling of satellite containers) was consistent throughout the university.

R315-5 Hazardous Generator Requirements:

- 5-1 Applicability: Based on BYU's hazardous waste generation, the university is a large quantity generator.
- 5-1.11 Determination of Whether a Waste is a Hazardous Waste. Based on the inspection, BYU has made proper determination of their hazardous wastes.
- 5-1.12 Identification Numbers. UTD 009094012
- 5-2 Manifest. The manifest file was in good order; however, manifest #003463065 did not have an accompanied LDR certification.
- 5-3 Pre-Transportation Requirements: Packaging, Labeling, Marking, and Placarding. Ok. No concerns.
- 5-3.34 Accumulation Time. Satellite accumulation containers throughout the university were not properly labeled. One open hazardous waste container in Chemicals Management Building (90-day storage).
- 5-4.40 Recordkeeping. All records were being kept in accordance with the regulations.
- 5-4.41 Biennial Reporting. BYU submits their Biennial reports and they are on file with DSHW.
- 5-4.42 Exception Reporting. OK. No concerns.
- 5-4.43 Additional Reporting. OK. No concerns.
- 5-5 Exports of Hazardous Waste. NA.
- 5-6 Imports of Hazardous Waste. NA.
- 5-7 Farmers. NA.

R315-7 Interim Status Requirements for Hazardous Waste Facilities

- 7-9.7 Personnel Training. OK. No concerns.
- 7-10 Preparedness/Prevention. OK. No concerns.

7-11 Contingency/Emergency Plan. OK. No concerns.

R315-9 Emergency Controls. All NA

R315-13 Land Disposal Restrictions

13-1 OK.

R315-16 Standards for Universal Waste Management

16-1 Scope. OK.

16-2 Standards for Small Quantity Handlers of Universal Waste.

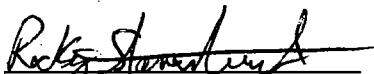
16-3 Standards for Large Quantity Handlers of Universal Waste. One open container that held used fluorescent tubes in Chemicals Management Building.

16-4 Standards for Universal Waste Transporters. NA.

16-5 Standards for Destination Facilities. NA.

16-6 Import Requirements. NA.

16-7 Petitions to Include Other Wastes Under R315-16. NA.



Signature

Rocky Stonestreet, Team Leader

4-14-2011

Date

Site: BYU

ID#: _____

Date: March 9, 2011

Hazardous Waste Inspection
Notification Checklist
Page 1 of 1

This checklist is designed to assist Division of Solid and Hazardous Waste personnel in conducting hazardous waste compliance inspections. It is not a substitute for any required form or regulation. (for additional information see EPA form 8700-12, Notification of Regulated Waste Activity)

Type of Regulated Waste Activity: (circle the notification activities that apply)

1. Generator
 - Large Quantity (>1000 kg/month)
 - Small Quantity (1000 kg/month < generator < 100 kg/month)
 - Conditionally Exempt (< 100 kg/month)
2. Transporter
3. Treatment/Storage/Disposal
4. Hazardous Waste Fuel
 - Generator Marketing
 - Other Marketing
 - Burner (device(s) must be indicated)
 - Utility Boiler
 - Industrial Boiler
 - Industrial Furnace
5. Underground Injection Control

Used Oil Fuel Activity:

1. Off-Specification Used Oil Fuel
 - Generator Marketing
 - Other Marketing
 - Burner (device(s) must be indicated)
 - Utility Boiler
 - Industrial Boiler
 - Industrial Furnace
2. Specification Used Oil Fuel Marketing

Waste Streams:

Teacher Labs (teaching projects - chemistry)
solvents, acids, bases
ignitable waste (largest waste streams)
aqueous waste (metals, oxidizers)

Comments:

Inspector's Initials: RLS

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Site: BVU

ID#: _____

Date: 3-9-11

Hazardous Waste Inspection
Large Quantity Generator Checklist
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INSPECTION ITEM	CITATION	COMMENTS
<u>Waste Determination:</u>	R315-5	
Has the generator determined whether his/her solid waste is a hazardous waste?	R315-5-1.11 262.11	yes
Has a waste determination been done for each waste stream?	R315-2-3 261.3	yes
Has the generator notified of regulated activity and obtained an EPA ID# in accordance with the requirements of Section 3010 of RCRA?	R315-5-1.12 262.12	yes
<u>Manifest:</u>		
1. Is the generator using a Uniform Hazardous Waste Manifest for its shipments of hazardous waste?	R315-5-2.20(a) 262.20(a)	yes
2. Did the generator designate a facility permitted to handle its waste?	R315-5-2.20(b) 262.20(b)	yes
3. Was an alternate facility designated?	R315-5-2.20(c) 262.20(c)	yes
4. Did the generator use the correct manifest?	R315-5-2.20(a) 262.20(a)	yes
<u>Manifest requirements for the Generator:</u>		
1. Did the generator sign the manifest certification by hand?	R315-5-2.23(a)(1) 262.23(a)(1)	yes
2. Did the generator obtain a handwritten signature from the initial transporter and the date of acceptance?	R315-5-2.23(a)(2) 262.23(a)(2)	yes
3. Did the generator retain a copy of the manifest in accordance with R315-5-4.40(a)?	R315-5-2.23(a)(3) 262.23(a)(3)	yes
<u>Recordkeeping</u>		
Is the generator maintaining signed copies of the hazardous waste manifest for three years?	R315-5-4.40(a) 262.40(a)	yes
Is the generator maintaining copies of each Biennial Report and all Exception Reports for a period of at least three years?	R315-5-4.40(b) 262.40(b)	yes

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Site: BYU

ID#: _____

Date: 3-9-11

Hazardous Waste Inspection
Large Quantity Generator Checklist
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INSPECTION ITEM	CITATION	COMMENTS
Is the facility maintaining records sufficient to determine quantities and disposition of hazardous waste or other determinations, test results, or waste analyses made in accordance with R315-5-1.11 for a period of at least three years from the date of last shipment?	R315-5-4.40(c) 262.40(c)	yes
Biennial Reporting Has the generator submitted complete Biennial Report(s)?	R315-5-4.41 262.41	yes
Exception Reporting Has the generator been required to prepare an Exception Report, if yes describe the circumstances.	R315-5-4.42 262.42	No
Packaging, Labeling, Marking, and Placarding 1. Is the generator packaging his/her hazardous waste in the appropriate DOT shipping containers? 2. Are containers labeled and marked in accordance with DOT shipping requirement prior to shipping? 3. Is the generator providing the appropriate placarding to the initial transporter when initiating his/her shipment?	R315-5-3.30 262.30 R315-5-3.31 & R315-5-3.32 262.31 & 262.32 R315-5-3.33 262.33	yes yes yes
Accumulation Times (See Satellite, 90 Day and Tank Checklists as applicable)	R315-5-3.34	yes
Also see checklist for: Personnel Training, Preparedness & Prevention, Contingency Plan & Emergency Procedures, and Manifest.		yes

Comments

Inspector's Initials: RLS

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Site: B40

ID#: _____

Date: 3-9-11

Hazardous Waste Inspection
90 Day Storage Site
> 55 gallons

Site Manager _____

INSPECTION ITEM	CITATION	COMMENTS
Is the container labeled with the words "Hazardous Waste" ?	R315-5-3.34 262.34(a)(3)	No, see report
Is the date upon which accumulation began clearly marked and visibly for inspection?	262.34(a)(2)	
Is that date <= 90 days old?	262.34(a)	
Is there a Preparedness and Prevention Plan for this site or the facility as a whole, including this site ? (see separate Check List)	262.34(a)(4) 265 Subpart C	yes
Operated to minimize chance of Spill or Fire ? Spill and Fire control equipment ? Emergency communication device: Internal? Emergency communication device: External ? Sufficient Aisle and Access space ?	R315-7-10.2 R315-7-10.3(c) R315-7-10.3(a) R315-7-10.3(b) R315-7-10.6	yes, 2-way radios, telephones & fire alarm
Is there a Contingency Plan for this site or the facility as a whole, including this site ? (see separate Check List)	262.34(a)(4) 265 Subpart D	yes
Description of actions that should be taken ? Name & Phone # for Emergency Coordinator? Primary and alternate evacuation routes ? List of emergency equipment & location ?	R315-7-11.3(a) R315-7-11.3(d) R315-7-11.3(f) R315-7-11.3(e)	yes, no concerns
Have personnel at this site Successfully completed up to date Personnel Training on HzW Handling & Fire & Spill Response? Is the training documented? (see separate Check List)	262.34(a)(4) R315-7-9.7(a) 265.16(a) R315-7-9.7(e) 262.16(e)	yes
Are the containers accumulating and holding hazardous waste in good condition? Are they compatible with the HzW in them?	262.34(a)(1)(i) 265 Subpart I, AA, BB, and CC R315-7-16.2 R315-7-16.3	yes
Is the generator maintaining his/her containers in a closed condition except when adding or removing waste from the container?	R315-7-16.4(a) 262.173(a)	No, see report
Containers holding hazardous waste must not be opened, handled and/or stored in a manner which could cause it to leak.	R315-7-16.4(b) 262.173(b)	No, see report
Is the generator inspecting his/her containers at least weekly, and do the inspections look for leaks, deterioration, and any factor that may cause a release of hazardous waste?	R315-7-16.5 262.174	yes
No ignitable or reactive HzW within 50 feet of the facility's property line.	R315-7-16.6 265.176	No concerns

Inspector's Initials: RLS

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Site: _____

ID#: _____

Date: _____

Hazardous Waste Inspection
Satellite Accumulation Checklist

Site Manager _____

< 55 gallons

INSPECTION ITEM	CITATION	COMMENTS
Is the satellite accumulation area at or near the point of generation?	R315-5-3.34 262.34(c)(1)	yes
Is the satellite area under the control of the operator of the process generating the waste?	262.34(c)(1)	yes
Does the generator have the accumulation container labeled with the words "hazardous waste" or with other words that identify the contents of the container?	262.34(c)(1)(ii)	No, see report
The generator can not store more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste at the satellite accumulation area.	262.34(c)(1)	No concerns
Are the containers in good conditions?	262.34(c)(1)(i)	yes
Is the hazardous waste stored in containers that are compatible with the waste?	262.34(c)(1)(i)	yes
Is the accumulation container being maintained in a closed condition except when waste is being added or removed?	262.34(c)(1)(i)	yes
Is the generator managing the accumulation container in a manner that will not cause it to leak or spill?	262.34(c)(1)(i)	yes
Is the generator correctly labeling and moving hazardous waste, in excess of the 55 gallon or 1 quart limits, to a 90-day storage area within 72 hours of exceeding the limit?	262.34(c)(2)	yes

Inspector's Initials: _____

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Site: BYU

ID#: _____

Date: 3-9-11

Hazardous Waste Inspection
Preparedness and Prevention Measures Checklist
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INSPECTION ITEM	CITATION	COMMENTS
Is the facility maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents?	R315-7-10.2 265.31 R315-5-3.34 262.34(a)(4)	yes
The facility must be equipped with items (1)-(4), identified below, <i>unless</i> it can be shown that hazardous waste managed at the site would not require the particular kind of equipment specified. 1. Does the facility have an internal communications or alarm system capable of providing immediate emergency instruction to its personnel? 2. Does the facility have a device capable of summoning external emergency assistance to the facility (phone or two-way radio)? 3. Does the facility have portable extinguishers, fire control equipment (including special extinguishing equipment necessary for their facility), spill control equipment, and decontamination equipment? 4. Does the facility have water at adequate volume and pressure to supply water hoses, or foam producing equipment, or automatic sprinklers, or water spray systems.	R315-7-10.3 265.32 R315-7-10.3(a) 265.32(a) R315-7-10.3(b) 265.32(b) R315-7-10.3(c) 265.32(c) R315-7-10.3(d) 265.32(d)	yes yes, both phone and two-way radio yes yes
Are facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment tested and maintained to assure its proper operation in time of an emergency?	R315-7-10.4 265.33	yes
Do facility personnel have immediate access to an internal alarm or emergency communication device, either directly through visual or voice contact, while managing hazardous waste? Is there ever just one employee on the premises while the facility is operating? If yes, does that person have immediate access to device capable of summoning external emergency assistance?	R315-7-10.5(a) 265.34(a) R315-7-10.5(b) 265.34(b)	yes yes

Site: _____

ID#: _____

Date: _____

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Date: _____

Hazardous Waste Inspection
Preparedness and Prevention Measures Checklist
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INSPECTION ITEM	CITATION	COMMENTS
Is aisle space maintained to allow the unobstructed movement of emergency personnel or equipment (<i>unless</i> aisle space is not needed for any of these purposes)?	R315-7-10.6 265.35	yes
<p>The facility must arrange the following types agreements or arrangements with local organizations (as appropriate):</p> <p>1. Has the facility made or attempted to make arrangements to familiarize local police, fire departments, and emergency response teams with the layout of the facility, character of the hazardous waste(s) managed, locations where facility personnel normally work, location of facility entrances and possible evacuation routes?</p> <p>2. Has the facility designated primary emergency authority to a specific police or fire department, when more than one police or fire department might respond in the event of an emergency?</p> <p>3. Have agreements with State emergency response teams, emergency responses contractors, and equipment suppliers been made?</p> <p>4. Have arrangements been made to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility?</p>	<p>R315-7-10.7(a) 265.37(a)</p> <p>R315-7-10.7(a)(1) 265.37(a)(1)</p> <p>R315-7-10.7(a)(2) 265.37(a)(2)</p> <p>R315-7-10.7(a)(3) 265.37(a)(3)</p> <p>R315-7-10.7(a)(4) 265.37(a)(4)</p>	<p>yes</p> <p>yes</p> <p>yes, need to update DEQ- DERR phone #</p>
If any State or local authorities have declined to enter into such arrangements, has the facility documented the refusal in the operating record?	R315-7-10.7(b) 265.37(b)	No concerns

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Site: BYU

ID#: _____

Date: 3-9-11

Hazardous Waste Inspection
Contingency Plan and Emergency Procedures Checklist
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INSPECTION ITEM	CITATION	COMMENTS
<u>General Requirements:</u>	R315-5-3.34 262.34(a)(4)	yes
Is a copy maintained at the facility?	R315-7-11.4(a) 265.53(a)	yes
Have copies been distributed to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon for assistance?	R315-7-11.4(c) 265.53(b)	yes, police & medical facility are in-house (BYU)
<u>Content of the Contingency Plan:</u>		
1. Does the contingency plan describe the actions facility personnel will take to minimize the hazard to human health or the environment when responding to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste?	R315-7-11.3(a) 265.52(a)	yes
2. Does the contingency plan describe arrangements agreed to by local police and fire departments, hospitals, contractors, and State and local emergency response teams?	R315-7-11.3(c) 265.52(c)	yes
3. Does the contingency plan list the names, addresses, and phone numbers (office and home) of primary and all other persons qualified to act as emergency coordinator?	R315-7-11.3(d) 265.52(d)	yes
4. Does the contingency plan include a list of all emergency equipment at the facility? The list must be kept up-to-date, and include the location and a physical description of each item on the list, and a brief outline of the equipment's capability.	R315-7-11.3(e) 265.52(e)	yes
5. Does the contingency plan include an evacuation plan for the facility? This plan must include a description of signal(s) to be used to begin an evacuation, evacuation routes, and alternate evacuation routes.	R315-7-11.3(f) 265.52(f)	yes
Does the facility have a least one employee on-site or on-call at all time who is qualified to act as the emergency coordinator?	R315-7-11.6 265.55	yes

Site: _____

ID#: _____

Date: _____

Inspector's Initials: RLS

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Hazardous Waste Inspection
Contingency Plan and Emergency Procedures Checklist
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INSPECTION ITEM	CITATION	COMMENTS
Does the contingency plan include procedures for activation of the internal alarm by the emergency coordinator?	R315-7-11.7(a)(1) 265.56(a)(1)	yes
Does the contingency plan include provision for notifying the appropriate State and/or local response agencies?	R315-7-11.7(a)(2) 265.56(a)(2)	yes
Does the contingency plan outline the procedure(s) that the emergency coordinator will follow to immediately identify the character, source, amount, and extent of released material?	R315-7-11.7(b) 265.56(b)	yes
Does the contingency plan include procedures for the emergency coordinator to follow in order to assess possible hazards to human health or the environment?	R315-7-11.7(c) 265.56(c)	yes
If it is determined that the incident could threaten human health or the environment, outside the facility, the emergency coordinator must notify the appropriate local, State and Federal agencies. Does the contingency plan include provision for notifying the appropriate agencies? Do the notification measures include information to be reported (name and telephone # of reporter, name and address of facility, name and quantity of material(s) involved, extent of injuries, and possibility of exposure outside the facility), and identify the National Response Center and the State as parties to be notified?	R315-7-11.7(d)(1) and (d)(2) 265.56(d)(1) and (d)(2)	yes, no concerns
Does the plan include procedure to prevent the spread of the incident to other hazardous waste at the facility?	R315-7-11.7(e) 265.56(e)	yes
Are measure included to monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, when it is necessary to shut-down operations as a response to an incident?	R315-7-11.7(f) 265.56(f)	yes

Site: _____

ID#: _____

Date: _____

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BYU

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Date:

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Hazardous Waste Inspection
Contingency Plan and Emergency Procedures Checklist
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INSPECTION ITEM	CITATION	COMMENTS
Does the contingency plan provide procedures to follow to manage the hazardous waste generated as a result of an incident?	R315-7-11.7(g) 265.56(g)	yes
Following implementation of the contingency plan, are provisions included to ensure that in the affected area(s): 1. No waste that may be incompatible with the released material is treated, stored, or disposed of until the cleanup is complete. 2. That all equipment listed in the contingency plan is cleaned and fit for use prior to resuming activities at the facility.	R315-7-11.7(h) 265.56(h) R315-7-11.7(h)(1) 265.56(h)(1) R315-7-11.7(h)(2) 265.56(h)(2)	No concerns yes
Does the contingency plan include provisions for notifying the appropriate federal, State and local authorities that the facility is in compliance with 40 CFR 265.56(h) prior to resuming operations in the affected area?	R315-7-11.7(i) 265.56(i)	yes
The contingency plan must include provision for recording the incident requiring implementation of the contingency plan and specifying information that will be recorded and reported. The requirements are as follows: 1. Will a written report on the incident be provided to the Utah State Department of Environmental Quality within 15 days? 2. The following information needs to be recorded and reported: a) The name, address, and telephone # of the owner/operator; b) The name address, and telephone # of the facility; c) Date, time, and type of incident; d) Name and quantity of material(s) involved; e) Extent of injury, if any; f) An assessment of the actual or potential hazard to human health or the environment; and g) An estimate of the quantity and disposition of recovered material(s) that resulted from the incident.	R315-7-11.7(j) 265.56(j) R315-7-11.7(j) 265.56(j) R315-7-11.7(j)(1) thru (j)(7) 265.56(j)(1) thru (j)(7)	yes, No concerns ↓

Inspector's Initials: _____

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Site: BYU

ID#: _____

Date: 3-9-11

Hazardous Waste Inspection
Personnel Training Checklist
Page 1 of 2

INSPECTION ITEM	CITATION	COMMENTS
Facility personnel must <i>successfully</i> complete classroom instruction or on-the-job training which teaches them to perform their jobs, such that the facility is operated in compliance with the applicable hazardous waste management requirements.	R315-5-3.34 262.34(a)(4) R315-7-9.7(a)(1) 265.16(a)(1)	yes ↓
Is the program directed by a person trained in hazardous waste management procedures?	R315-7-9.7(a)(2) 265.16(a)(2)	yes, James Cecil
Does the training teach facility personnel hazardous waste management and contingency plan implementation procedures?	R315-7-9.7(a)(2) 265.16(a)(2)	yes
Does the training program include, at a minimum, the following, where applicable: 1. Procedures for using, inspecting, repairing, and replacing facility emergency equipment; 2. Key parameters for automatic waste cut-off systems; 3. Communications or alarm systems; 4. Response to fires or explosions; 5. Response to groundwater contamination incidents; 6. Shutdown of operations; and 7. Evacuation of personnel procedures.	R315-7-9.7(a)(3) 265.16(a)(3) R315-7-9.7(a)(3)(i) 265.16(a)(3)(i) R315-7-9.7(a)(3)(ii) 265.16(a)(3)(ii) R315-7-9.7(a)(3)(iii) 265.16(a)(3)(iii) R315-7-9.7(a)(3)(iv) 265.16(a)(3)(iv) R315-7-9.7(a)(3)(v) 265.16(a)(3)(v) R315-7-9.7(a)(3)(vi) 265.16(a)(3)(vi)	B yes ↓

Site: _____

ID#: _____

Date: _____

Inspector's Initials: _____

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Hazardous Waste Inspection
Personnel Training Checklist
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INSPECTION ITEM	CITATION	COMMENTS
Have facility personnel <i>successfully</i> completed the personnel training program within six months of the their date of employment or assignment to the facility?	R315-7-9.7(b) 265.16(b)	yes
Do the facility personnel recieve an annual review of their initial training?	R315-7-9.7(c) 265.16(c)	yes
<p>The owner/operator of the facility must maintain the following documents at the facility:</p> <p>1. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;</p> <p>2. A writtem job description for each position listed under #1;</p> <p>3. A written description of the type and amount of both introductory and continuing training that will be given to the employees listed in #1, and;</p> <p>4. Records that document that employees have the training or job experience required by paragraphs 265.16 (a), (b), and (c).</p>	<p>R315-7-9.7(d) 265.16 (d)</p> <p>R315-7-9.7(d)(1) 265.16 (d)(1)</p> <p>R315-7-9.7(d)(2) 265.16 (d)(2)</p> <p>R315-7-9.7(d)(3) 265.16 (d)(3)</p> <p>R315-7-9.7(d)(4) 265.16 (d)(4)</p>	<p>yes</p> <p>↓</p>
Are training records maintained at the facility for current employees and for at least three years for employees that have left the company?	R315-7-9.7(e) 265.16(e)	yes

Site: Brigham Young University ID#: UTD 009 094 012Date: March 9, 2011Hazardous Waste Inspection
Manifest Checklist (Rev. 3-05)

Requirements:

Manifests

Reviewed:

Manifest Number (box 4)	# 001125442	# 001125459	# 003105730	# 003105736
Generator EPA ID# R315-5-2 (box 1)	OK	OK	OK	OK
Generator information: Mailing Address (box 5) Phone Number	OK	OK	OK	OK
Transporter #1 information: Company Name (box 6) EPA ID# (box 6)	OK	OK	OK	OK
Transporter #2 information: Company Name (box 7) EPA ID# (box 7)	NA	OK	OK	OK
Designated Facility information: Name and Address (box 8) EPA ID# (box 8) Phone Number (box 8)	OK	OK	OK	OK
Waste Shipping requirements: DOT Description (Including proper name, Hazard class, and ID #) (box 9b) (box 9a "X" if hazardous materials) Containers: No & Type (box 10) Total Quantity (box 11) Unit - Wt/Vol (box 12) Waste Codes (box 13)	OK ↓	OK ↓	OK ↓	OK ↓
Special Handling Instructions (box 14)	OK	OK	OK	OK
Manifest Certifications: Generator's Signature (box 15) International Shipments (box 16) Transporter's Signature (box 17) Discrepancy Indication (box 18) Hazardous Waste Report Management Method Codes (box 19)	OK ↓ NA	OK ↓ 18 - NA OK ↓ OK 90	OK ↓	OK ↓

Final Observations and
Comments:manifest numbers ~~003105735~~ 003463065 - NO LDRs

Common container codes: DM - metal drum/barrel; DF - fiberbarrel; TT - cargo tank; TC - tank car; DT - dump truck; CM - metal box/carton (includes roll-offs) Common Units of Measure: G - gallons; P - pounds; T - tons; Y - cubic yards

Inspector's Initials: gjo

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